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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA ALLEN,) Case No. 2:12-cv-07173-MAM
)
Plaintiff,) NOTICE OF MOTION AND
) MOTION TO ENTER DEFAULT
vs.) JUDGMENT
)
THE RESOURCE CENTER, INC.,)
)
Defendant.)
_____)

NOTICE IS HEREBY GIVEN that Plaintiff hereby motions the Court to Enter Default Judgment against Defendant, The Resource Center, Inc.

NOW COMES PLAINTIFF, by and through his attorney, Cynthia Z. Levin, to respectfully request that this honorable Court enter default judgment against Defendant. A default was previously entered by the Clerk of this Court on April 23, 2013. Plaintiff hereby requests that judgment be entered in the amount of four thousand two hundred and thirty five dollar and fifty cents (\$4,235.50),

1 including statutory damages in the amount of one thousand dollars (\$1,000.00) 15
2 U.S.C. §1692(k)(a)(2)(A). In addition, Plaintiff requests two thousand eight
3
4 hundred and thirty-five dollars and fifty cents (\$2,835.50) in attorney fees to date
5 and four hundred dollars (\$400) in costs to date. 15 U.S.C. §1692(k)(a)(3) for a
6
7 total of four thousand two hundred and thirty five dollar and fifty cents
8 (\$4,235.50), inclusive of attorneys' fees and court costs.

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10 This Motion is based on this Notice, the attached declarations of Cynthia
11 Levin and Lisa Allen, and the pleadings, files, and other matters that may be
12 presented at the hearing.

13
14 Respectfully submitted this 8th day of May, 2013.

15 By: s/Cynthia Z. Levin
16 **Cynthia Z. Levin (27050)**
17 **Attorney for Plaintiff**

18 Filed electronically on this 8th day of May, 2013, with:

19 United States District Court CM/ECF system

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21 Notification sent via ECF and courtesy copy sent on this 8th day of May, 2013 to:

22 United States District Court CM/ECF system

23
24 A copy has been mailed on this 8th day of May, 2013 to:

25 The Resource Center, Inc.
26 358 S 700 E Ste B # 325 PMB
27 Salt Lake City, UT 84102-2160

28 s/Cynthia Z. Levin
Cynthia Z. Levin